

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Michael Anthony Cuff
Debtor 1

Nationstar Mortgage, LLC d/b/a Mr. Cooper
Movant(s)

v.

Michael Anthony Cuff
Tabitha A. Bosack (Non-Filing Co-Debtor)

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
Additional Respondent

Chapter 13

Case No. 1:21-BK-02542-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 36

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Michael Anthony Cuff, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Upon information and belief, the averments as stated in Paragraph 4 are admitted.
5. Admitted.
6. Upon information and belief, the averment as stated in Paragraph 6 is admitted.
7. Denied. Debtor(s) have brought their account with payments totaling \$6,845.95.
8. Denied. Debtor(s) have brought their account with payments totaling \$6,845.95.
9. Admitted.
10. Paragraph 10 contains a conclusion of law to which no response is required.
11. Denied. Debtor(s) are without sufficient information as to the averments as stated in Paragraph 11; therefore, they are denied. Strict proof is demanded.
12. Paragraph 12 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: July 28, 2022

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Camp Hill, PA 17011
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Thursday, July 28, 2022, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Rebecca Solarz, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire